

EXHIBIT 22

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

-----)	
DETROIT POLICE OFFICER IRA LEE)	
TODD, JR.,)	
)	
Plaintiff,)	Civil Action
)	
-vs-)	No. 08-119322 NZ
)	
KWAME KILPATRICK, Individually)	
and in his capacity as Mayor)	
of the City of Detroit, and)	
THE CITY OF DETROIT, a Michigan)	
municipal corporation, Jointly)	
and Severally,)	
)	
Defendants.)	
-----)	

The Deposition of JAMES W. TOLBERT taken
before me, Sheila D. Rice, CSR-4163, a Notary Public
within and for the County of Wayne, State of Michigan, at
615 Griswold, Suite 822, Detroit, Michigan, on Wednesday,
October 29, 2008.

APPEARANCES:

STEFANI & STEFANI
512 E. Eleven Mile Road
Royal Oak, Michigan 48067
(By Michael L. Stefani, Esq.),
Appearing on behalf of Plaintiff,
CITY OF DETROIT LAW DEPARTMENT
660 Woodward Avenue, Suite 1650
Detroit, Michigan 48226
(By June C. Adams, Esq.
and Sydney R. Turner, Esq.),
Appearing on behalf of Defendants.

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1 THE WITNESS: I understand.

2 MR. STEFANI: And I'm going to ask
3 you some questions. Your lawyers may ask you some
4 questions when I'm done. If you don't understand
5 any of my questions or they're confusing in any
6 way, feel free to ask me to explain what I mean or
7 to repeat a question.

8 Is that fair?

9 THE WITNESS: I understand.

10 MR. STEFANI: And I'm going to -- if
11 you don't ask me to repeat a question and you just
12 go ahead and answer it, we're going to assume that
13 you understood the question and you answered it
14 truthfully.

15 Do you understand that?

16 THE WITNESS: I understand.

17

18 EXAMINATION

19 BY MR. STEFANI:

20 Q. Okay. Would you state your full name for the
21 record, please.

22 A. James Winston Tolbert.

23 Q. And your date of birth?

24 [REDACTED], 1960.

25 Q. And your place of birth?